

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1. FRANK JONES,)	
)	
Plaintiff,)	
)	
v.)	Case No. 21-cv-00260-TCK-CDL
)	
1. UNITED STATES OF)	
AMERICA ex rel. UNITED)	
STATES POSTAL SERVICE,)	
)	
Defendant.)	

COMPLAINT

COMES NOW the Plaintiff, Frank Jones, and for his cause of action states as follows:

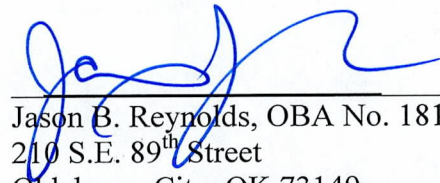
1. Jurisdiction is vested in this court pursuant to 28 U.S.C. Section 1331 in that this action arises from the Federal Tort Claims Act, 28 U.S.C. Section 2671, et seq.
2. Venue is proper in this Court pursuant to 28 U.S.C. Section 1391 (a).
3. On or about September 19, 2020, Plaintiff, Frank Jones, was involved in a collision with an automobile driven by Michelle Williams. The collision occurred near the intersection of W 71st N. and W. 69th Street N., in Osage County, near Tulsa, Oklahoma.
4. The collision described above was a direct result of the negligence of Michelle Williams in that she failed to exercise reasonable care in operating the vehicle she was driving.
5. That at the time of the subject collision, Michelle Williams was an agent, servant, and/or employee of Defendant United States of America ex rel. United States Postal Service, and was acting in that capacity.

6. Defendant United States of America ex rel. United States Postal Service is responsible for the acts of its agents, servants, and/or employees who are acting within the course and scope of their duties pursuant to the doctrine of *respondeat superior*.
7. That as a result of the Defendant's negligence, Plaintiff Frank Jones has incurred medical expenses, loss of earnings, physical pain and suffering, mental pain and suffering and property damage.
8. That as a result of the above-referenced acts, Plaintiff have been damaged in an amount in excess of \$75,000.00.

WHEREFORE, Plaintiff, Frank Jones, prays for judgment against the Defendant in an amount in excess of \$75,000.00, plus interest, costs, and all other relief this Court deems just and equitable.

Respectfully submitted,

GRIFFIN, REYNOLDS & ASSOCIATES



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